

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MARTA WILLIAMS,	:	
	:	
Plaintiff,	:	
	:	
v.	:	CIVIL ACTION
	:	
ABRAHAM INDUSTRIES, INC., t/db/a	:	No. 02-CV-5240
VALLEY FORGE FLAG, INC., et al.	:	
	:	
Defendants.	:	
	:	

**DEFENDANTS GREGORY HARRIS' AND SCOTT LIBERMAN'S
MOTION TO DISMISS COUNT I OF THE COMPLAINT**

TO: Marta Williams
c/o Debra A. Jensen, Esquire
Galfand Berger LLP
1818 Market Street
Philadelphia, PA 19103-3623

PLEASE TAKE NOTICE that counsel for Defendants Gregory Harris and Scott Liberman shall appear before the United States District Court for the Eastern District of Pennsylvania, 601 Market Street, Philadelphia, PA 19103, on the ____ day of _____, 20____, at _____ am/pm, or as soon thereafter as counsel may be heard, to move this Court to enter an Order granting their Motion to Dismiss Plaintiff's Complaint with prejudice.

Defendants Gregory Harris and Scott Liberman shall rely on the accompanying Memorandum of Law in support of their Motion to Dismiss Count I of the Complaint.

Respectfully submitted,

BLANK ROME COMISKY & McCAULEY LLP

/s/ Richard S. Meyer
RICHARD S. MEYER, ESQUIRE
MARGARET A. McCAUSLAND, ESQUIRE
JENNIFER J. PLATZKERE, ESQUIRE
One Logan Square
Philadelphia, PA 19103
(215) 569-5665

Attorneys for Defendants
Gregory Harris and Scott Liberman

Dated: September 25, 2002